

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

HEALTH REPUBLIC INSURANCE	:	
COMPANY,	:	No. 16-259C
	:	
Plaintiff,	:	Judge Davis
	:	
v.	:	
	:	
UNITED STATES OF AMERICA,	:	
	:	
Defendant.	:	

THE UNITED STATES' UNOPPOSED MOTION FOR AN EXTENSION OF TIME

Pursuant to RCFC 6(b), the United States respectfully requests a 14-day extension of time, up to and including January 22, 2021, within which to file its response to the Dispute Subclass' motion to dismiss, Docket No. 103. The United States' response is currently due January 8, 2021.

This is the United States' second request for an enlargement. As set forth in the first request, Docket No. 106, this case raises important legal issues and implicates nearly more than \$95 million in federal debt and requires extensive coordination with other branches of the Department of Justice and with the Department of Health and Human Services. This second extension is to accommodate the holiday schedules of several members of the United States' trial team and permit adequate review and coordination of the government's response. The Dispute Subclass does not oppose the requested extension, and the requested extension will not prejudice the parties or result in undue delay.

For these reasons, the United States respectfully requests an extension of 21 days, up to and including January 8, 2021, to file its response to the Dispute Subclass' motion to dismiss.

Dated: December 29, 2020

Respectfully submitted,

JEFFREY BOSSERT CLARK
Acting Assistant Attorney General
Civil Division

RUTH A. HARVEY
Director
Commercial Litigation Branch

KIRK T. MANHARDT
Deputy Director

/s/ Terrance A. Mebane

TERRANCE A. MEBANE

MARC S. SACKS

FRANCES M. MCLAUGHLIN

PHILLIP SELIGMAN

SHANE HUANG

United States Department of Justice
Civil Division, Commercial Litigation Branch
Telephone: (202) 307-0493
terrance.a.mebane@usdoj.gov

Counsel for the United States of America